

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

By:

Open Court
FILED IN CHAMBERS
U.S.D.C. Atlanta

MAR 27 2019

JAMES N. HATTEN, Clerk
[Signature]

UNITED STATES OF AMERICA

v.

ANTHONY RONDEL BLAIR;
JASON ARIAS;
DANIEL NEWTON,
a/k/a "Russia";
DAVID LOMBA BARROS;
ANGELICA DOMINIQUE CUYUGAN TUZON;
SHONDRA VERNON,
a/k/a "Frenchie";
MICHELLE ROSA; and
MADISON RENEE KELLEHER

Second Superseding
Criminal Indictment

No.
1:18-CR-00260-LMM-CMS

UNDER SEAL

THE GRAND JURY CHARGES THAT:

COUNT ONE

Beginning on a date unknown to the Grand Jury, but at least as early as in or about October, 2015, and continuing until at least in or about June, 2018, in the Northern District of Georgia and elsewhere, the defendants,

ANTHONY RONDEL BLAIR;
JASON ARIAS;
DANIEL NEWTON;
DAVID LOMBA BARROS;
ANGELICA DOMINIQUE CUYUGAN TUZON;
SHONDRA VERNON; and
MICHELLE ROSA

did knowingly and intentionally combine, conspire, confederate, agree, and have a tacit understanding with persons known and unknown to the Grand Jury to violate Title 21, United States Code, Sections 952(a) and 960(a)(1), that is, to knowingly and intentionally import into the United States from a place outside the United States a controlled substance, said conspiracy involving:

- a) 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 960(b)(1)(B), as to ANTHONY RONDEL BLAIR, JASON ARIAS, DANIEL NEWTON, DAVID LOMBA BARROS, ANGELICA DOMINIQUE CUYUGAN TUZON, and SHONDRA VERNON; and
- b) 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 960(b)(2)(B), as to MICHELLE ROSA,

all in violation of Title 21, United States Code, Section 963.

COUNT TWO

Beginning on a date unknown to the Grand Jury, but at least as early as in or about May, 2017, and continuing until at least in or about June, 2018, in the Northern District of Georgia and elsewhere, the defendants,

ANTHONY RONDEL BLAIR;
JASON ARIAS;
DANIEL NEWTON;
DAVID LOMBA BARROS;
ANGELICA DOMINIQUE CUYUGAN TUZON;
SHONDRA VERNON; and
MICHELLE ROSA

did knowingly and intentionally combine, conspire, confederate, agree, and have a tacit understanding with persons known and unknown to the Grand Jury to violate Title 21, United States Code, Section 841(a)(1), that is, to knowingly and intentionally possess with intent to distribute a controlled substance, said conspiracy involving:

- a) 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A), as to ANTHONY RONDEL BLAIR, JASON ARIAS, DANIEL NEWTON, DAVID LOMBA BARROS, ANGELICA DOMINIQUE CUYUGAN TUZON, and SHONDRA VERNON; and
- b) 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B), as to MICHELLE ROSA,

all in violation of Title 21, United States Code, Section 846.

COUNT THREE

On or about February 5, 2018, in the Northern District of Georgia and elsewhere, the defendants,

ANTHONY RONDEL BLAIR;
JASON ARIAS; and
SHONDRA VERNON

aided and abetted by each other and by others known and unknown to the Grand Jury, did knowingly and intentionally import into the United States from a place outside the United States a controlled substance, said act involving five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FOUR

On or about February 5, 2018, in the Northern District of Georgia and elsewhere, the defendants,

ANTHONY RONDEL BLAIR;
JASON ARIAS; and
SHONDRA VERNON

aided and abetted by each other and by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to possess with intent to distribute a controlled substance, said act involving five kilograms or more of a mixture and substance containing a detectable

amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FIVE

On or about June 10, 2018, in the Northern District of Georgia and elsewhere, the defendants,

ANTHONY RONDEL BLAIR;
JASON ARIAS;
DAVID LOMBA BARROS; and
MICHELLE ROSA

aided and abetted by each other and by others known and unknown to the Grand Jury, did knowingly and intentionally import into the United States from a place outside the United States a controlled substance, said act involving five hundred grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(2)(B), and Title 18, United States Code, Section 2.

COUNT SIX

On or about June 10, 2018, in the Northern District of Georgia and elsewhere, the defendants,

ANTHONY RONDEL BLAIR;
JASON ARIAS;
DAVID LOMBA BARROS; and
MICHELLE ROSA

aided and abetted by each other and by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to possess with intent to distribute a controlled substance, said act involving five hundred grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT SEVEN

Beginning on a date unknown to the Grand Jury, but at least as early as in or about May, 2017, and continuing until in or about June, 2018, in the Northern District of Georgia and elsewhere, the defendants,

ANTHONY RONDEL BLAIR;
JASON ARIAS;
DANIEL NEWTON;
DAVID LOMBA BARROS;
SHONDRA VERNON;
MICHELLE ROSA; and
MADISON RENEE KELLEHER

did knowingly combine, conspire, confederate, agree, and have a tacit understanding with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit, to knowingly conduct and attempt to conduct a financial transaction in and affecting interstate and foreign commerce:

- a) which involved the proceeds of specified unlawful activity, that is, the manufacture, importation, sale, and distribution of a controlled substance (as such term is defined for the purposes of the Controlled Substances Act), with the intent to promote the carrying on of specified unlawful activity, and that while conducting and attempting to conduct such financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i);
- b) which involved the proceeds of specified unlawful activity, that is, the manufacture, importation, sale, and distribution of a controlled substance (as such term is defined for the purposes of the Controlled Substances Act), knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and that while conducting and attempting to conduct such financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and
- c) which involved the proceeds of specified unlawful activity, that is, the manufacture, importation, sale, and distribution of

a controlled substance (as such term is defined for the purposes of the Controlled Substances Act), knowing that the transaction was designed in whole and in part to avoid a transaction reporting requirement under Federal law, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii),

all in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE PROVISION

Upon conviction of one or more of the offenses alleged in Counts One through Six of this Indictment, the defendants, ANTHONY RONDEL BLAIR, JASON ARIAS, DANIEL NEWTON, DAVID LOMBA BARROS, ANGELICA DOMINIQUE CUYUGAN TUZON, SHONDRA VERNON, and MICHELLE ROSA shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853(a) and 970, all property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and all property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations, including, but not limited to, the following:

- a. MONEY JUDGMENT: A sum of money in United States currency equal to the amount of proceeds the defendant obtained as a result of the offenses for which the defendant is convicted.

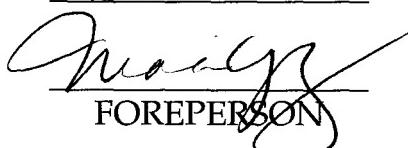
Upon conviction of the offenses alleged in Count Seven of this Indictment, the defendants, ANTHONY RONDEL BLAIR, JASON ARIAS, DANIEL NEWTON, DAVID LOMBA BARROS, SHONDRA VERNON, MADISON RENEE KELLEHER, and MICHELLE ROSA shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in the offense and any property traceable to such property, including, but not limited to, the following:

- a. MONEY JUDGMENT: A sum of money in United States currency representing the total amount of money involved in each offense for which the defendant is convicted.

If, as a result of an act or omission of defendant, any property subject to forfeiture:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

the United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 21, United States Code, Section 982(b) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

A True BILL

FOREPERSON

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